## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

| DR. PRAHBJOT UPPAL,                                     | )                      |
|---------------------------------------------------------|------------------------|
| Plaintiff,                                              | )                      |
| vs.                                                     | ) Case No. 15-cv-3806  |
| ROSALIND FRANKLIN UNIVERSITY OF<br>MEDICINE AND SCIENCE | Judge Ronald A. Guzman |
| Defendant.                                              | )<br>)                 |

## DEFENDANT ROSALIND FRANKLIN UNIVERSITY OF MEDICINE AND SCIENCE'S MOTION TO DISMISS, OR ALTERNATIVELY, TO STRIKE, PLAINTIFF'S FIRST AMENDED COMPLAINT

Defendant, Rosalind Franklin University of Medicine and Science (the "University"), by its undersigned attorneys, moves this Court to dismiss Plaintiff, Dr. Prabhjot Uppal's ("Plaintiff"), First Amended Complaint, in its entirety with prejudice, for failure to state a claim pursuant to Fed. R. Civ. P. 12(b)(6), or alternatively, to strike portions of Plaintiff's First Amended Complaint pursuant to Fed. R. Civ. P. 12(f) for the reasons stated in its Memorandum in Support filed with this motion.

Dated: June 26, 2015 Respectfully submitted,

ROSALIND FRANKLIN UNIVERSITY OF MEDICINE AND SCIENCE

By: /s/ William M. McErlean
One of its Attorneys

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## **CERTIFICATE OF SERVICE**

I hereby certify that on June 26, 2015 a copy of the foregoing **Defendant Rosalind Franklin University of Medicine and Science's Motion to Dismiss, or Alternatively, to Strike Portions of, Plaintiff's First Amended Complaint was filed electronically.** Notice of this filing will be sent to the attorneys of record by operation of the Court's electronic filing system. Parties may access this filing through the Court's system.

/s/ William M. McErlean
William M. McErlean